

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, et al.

Plaintiff,

vs.

BRAD RAFFENSPERGER, et al.

Defendant.

**CIVIL ACTION FILE
NO.: 1:17-cv-2989-AT**

DECLARATION OF BRUCE P. BROWN

Bruce P. Brown hereby declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I have personal knowledge of all facts stated in this declaration, and if called to testify, I could and would testify competently thereto.

2. I represent the Coalition Plaintiffs in this case.

3. Attached as Exhibit 1 is a screenshot of a photograph that accompanied an Atlanta Journal Constitution article by Mark Niese dated January 10, 2023.

4. Attached as Exhibit 2 is a true and correct copy of a December 4, 2022 memo from the Election Division to county election officials. Coalition Plaintiffs received this document in response to an Open Records Act request.

5. The following is a link to a February 4, 2023 Associate Press article on the growing concern over the security of electronic pollpads.

<https://apnews.com/article/arizona-united-states-government-2022-midterm-elections-donald-trump-los-angeles-651d0e923973daf28ff3b9d6105b4d74>.

This 10th day of February, 2023.

A handwritten signature in black ink, appearing to read 'B. P. Brown', written over a horizontal line.

Bruce P. Brown